

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

DON GIBSON, LAUREN CRISS, and)	
JOHN MEINERS, individually and on)	
behalf of all others similarly situated,)	Case No. 4:23-cv-00788-SRB
)	
Plaintiffs,)	
)	
v.)	
)	
NATIONAL ASSOCIATION OF)	
REALTORS, et al.)	
)	
Defendants.)	

DANIEL UMPA, on behalf of himself)	
and all others similarly situated,)	Case No. 4:23-cv-00945-SRB
)	
Plaintiffs,)	
)	
v.)	
)	
NATIONAL ASSOCIATION OF)	
REALTORS, et al.,)	
)	
Defendants.)	

**NOTICE OF PENDING SETTLEMENT AND JOINT MOTION TO STAY CASE AS TO
COMPASS, INC.**

Don Gibson, Lauren Criss, John Meiners, and Daniel Umpa (collectively “Plaintiffs”) and Compass, Inc. (“Compass” and, together with Plaintiffs, the “Parties”) respectfully write to the Court to provide notice that Plaintiffs have reached an agreement with Compass to settle all claims asserted against Compass in this action as part of a proposed nationwide class settlement. The settlement was jointly negotiated with the *Gibson* and *Umpa* Plaintiffs. This agreement is subject to the Court’s approval under Federal Rule of Civil Procedure 23. Consistent with the Parties’ agreement, Plaintiffs will promptly file a motion in this Court for preliminary approval of the proposed settlement.

As provided by the agreement, Plaintiffs and Compass hereby jointly stipulate and request that the

Court stay all deadlines and proceedings solely as to Compass to preserve the resources of Plaintiffs, Compass, and the Court, and to seek preliminary and final approval of the settlement.

Dated: March 22, 2024

Respectfully submitted by:

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CERTIFICATE OF SERVICE

I hereby certify that on March 22, 2024, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send a notice of electronic filing to counsel of record for this case.

/s/ Daniel A. Sasse

Daniel A. Sasse

Attorney for Defendant Compass, Inc.